

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:
JOHN A. REESE, III,

Debtor,

CITADEL FEDERAL CREDIT UNION,
Movant.

CASE NO. 18-10265-elf
CHAPTER 13

Hearing Date: 10/20/2020
Hearing Time: 9:30 am

REQUEST FOR ADMISSIONS

Pursuant to F.R.C.P. 36, Movant hereby requests the following admissions of the Respondent:

1. The Respondent/Debtor, John A Reese, III, has failed to make the payments that were due to

Movant on the dates listed below and in the amounts listed below:

- (a) One (1) monthly payment of \$396.05, due on 7/7/2019.
- (b) One (1) monthly payment of \$604.81, due on 8/7/2019.
- (c) One (1) monthly payment of \$604.81, due on 9/7/2019.
- (d) One (1) monthly payment of \$604.81, due on 10/7/2019.
- (e) One (1) monthly payment of \$604.81, due on 11/7/2019.
- (f) One (1) monthly payment of \$604.81, due on 12/7/2019.
- (g) One (1) monthly payment of \$604.81, due on 1/7/2020.
- (h) One (1) monthly payment of \$604.81, due on 2/7/2020.
- (i) One (1) monthly payment of \$604.81, due on 3/7/2020.
- (j) One (1) monthly payment of \$604.81, due on 4/7/2020.
- (k) One (1) monthly payment of \$604.81, due on 5/7/2020.
- (l) One (1) monthly payment of \$604.81, due on 6/7/2020.
- (m) One (1) monthly payment of \$604.81, due on 7/7/2020.
- (n) One (1) monthly payment of \$604.81, due on 8/7/2020.
- (o) One (1) monthly payment of \$604.81, due on 9/7/2020.

Respectfully Submitted

/s/ Nathalie Paul

Nathalie Paul, PA Bar No. 309118

Attorney for Movant

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